COLLIERVILLE SCHOOLS
SCHOLARSHIP · INTEGRITY · SERVICE

P. Michael Simpson, *Chief Operating Officer*
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November 21, 2016

Joellyn Brazile, CPESC
Environmental Program Manager
Division of Water Resources
Memphis Environmental Field Office
8383 Wolf Lake Drive
Bartlett, TN 38133

RE: Response To Violations-TN Individual Construction Permit Tracking Number: TN0081787

Dear Ms. Brazile:

I am responding to the Notice of Violation-TN Individual Construction Permit Tracking Number: TN0081787 received in my office on Monday, November 7, 2016. By way of this letter, I am addressing each violation outlined in your letter dated November 3, 2016. I have had multiple meetings with all parties who have responsibility for maintaining our construction permit and reviewed the required actions and necessary steps to correct the violations noted. A separate meeting was held where we invited Mr. Steve Owens, Environmental Scientist to discuss our corrective measures and observe those measures on the site.

I am enclosing a separate document addressing each identified violation including a detailed written response and photo record describing corrective actions taken and measures implemented to prevent the recurrence of these violations.

Please contact me should you have any questions.

Sincerely,

P. Michael Simpson,
Chief of Operations

Enclosures

Cc: John S. Aitken, Superintendent – Collierville Schools
Mike McDaniel, Flintco
Sam Ginn, Flintco
Rusty Linkous, Linkous Construction
Tim Weatherford, Flintco
John Browning, Browning Construction
Bobby Thomas, Reel Neet Erosion Control
Blake Thomas, Reel Neet Erosion Control
Wesley Wooldridge, Renaissance Group
Sal Feraci, Renaissance Group
Steven Williams, Renaissance Group
Scott Fleming, Fleming Architects
Will Ward, TDEC-Division of Water Resources.

Collierville Schools Response to Required Actions:

- Eliminate the discharge of sediment and sediment-laden stormwater off-site and to the unnamed tributary of Nonconnah Creek (i.e., waters of the state) by installing and maintaining all appropriate erosion prevention and sediment control measures in accordance with the best management practices described the Tennessee Erosion and Sediment Control Handbook and submitted SWPPP, note additional best management practices not mentioned in the SWPPP may be necessary;
    - In order to eliminate this problem, the SE sediment basin and depth gauge has been installed. In addition, a diversion ditch has been dug to control water and direct it to the SE basin. The material excavated from this ditch has been placed between the ditch and the sediment silt fence along the top of the permanent ditch along the southern property line. All material from the ditch and the ditch itself has been stabilized with hydro-seed.
    - A rock check dam as well as angled silt fence have been installed just West of the diversion ditch to handle any waters that do not make it to the ditch. All best management practices have been checked and silt fences along the ditch line have been repaired.
- Immediately install the SE sediment basin and temporary diversion ditch in accordance with the submitted SWPPP.
    - The SE sediment basin and depth gauge has been installed in accordance with the submitted SWPPP. In addition, a diversion ditch has been dug to control water and direct it to the SE basin. The material excavated from this ditch has been placed between the ditch and the sediment silt fence along the top of the permanent ditch along the southern property line. All material from the ditch and the ditch itself has been stabilized with hydro-seed.

- Immediately install the required water depth gauge in the NE and NW sediment basins and in the SE sediment basin once it is installed;
    - The required water depth gauges have been installed in the NE and NW sediment basins. The SE sediment basin has been dug and the depth gauge is installed.
- Post the required notice with all appropriate information as described on page 34 of the permit;
    - There are 3 notices posted on our site. One is located on Shelby Drive even though Shelby Drive is closed for road improvements. Two notices are placed on each of the entrances off Sycamore Drive. The notice on the main entrance off Sycamore is attached to the fence near the entry road.
- Take appropriate measures to ensure that hydroseed does not enter the unnamed tributary of Nonconnah Creek (i.e., waters of the state);
    - We will ensure that hydroseed does not enter the unnamed tributary of Nonconnah Creek by eliminating any spraying from one bank over the tributary to the other bank. At this time, there is no more planned seeding of the banks of the tributary.

- Address issues that are identified during the twice-weekly inspection or by other means within 7 days of identification;
    - There will be improved communication between the owner, civil engineer, erosion control contractor and site contractor. Any items noted on the twice weekly reports will be addressed by the contractor within 7 days of identification.
- Stabilize all areas that are inactive including, but not limited to the banks of the sediment basins, areas around outlet pipes, all slopes where rills have formed and drainage/diversion channels with temporary or permanent stabilization practices. Please note that applying grass seed on these areas does not constitute the areas to be stabilized;
    - All areas that have been inactive or will be inactive have been identified and addressed with stabilization, including the banks of sediment basins, areas around outlet pipes, slopes where rills have formed, etc. In all cases, best management practices have been used including using sod, hydro-seed, Flex Terra, rock check dams, etc. The only areas not being addressed are those that are being disturbed daily.
- Install the appropriate signage as required by the permit at all permitted outfalls;
    - All outfall signs have been installed, including outfall SW7 which was on order as it was a new outfall added to the permit on November 1, 2016. In addition, outfall signs that were installed along the Shelby Drive roadway have been moved back onto the site property to protect them from destruction from construction beginning on the Shelby Drive improvements.
- Install the appropriate signage as required by the permit at each public right-of-way.
    - There are 3 notices posted on our site. One is located on Shelby Drive even though Shelby Drive is closed for road improvements. Two notices are placed on each of the entrances off Sycamore Drive. The notice on the main entrance off Sycamore is attached to the fence near the entry road.
- Beginning in the October 2016 reporting period, please including a summary of the months twice-weekly inspections with the monthly quality assurance site assessment report. Note this report was submitted in November 2016. It may also be beneficial if the sampling results are incorporated in the report along with any actions that took place as a result of their analysis.
    - A summary of the October twice-weekly inspections has been included in the October monthly site assessment. Beginning in November, a summary of the sampling results and all actions taken as a result of their analysis will be included in the monthly site assessment.
- Ensure all twice-weekly inspection reports are signed by the primary permittee or their duly authorized representative.
    - All twice-weekly inspection reports will be signed by either Mike McDaniel, Flintco Project Manager or Mike Simpson, Chief of Operations for Collierville Schools.
- Immediately begin sampling IMP1 and IMP2 at the required frequency as described in the permit.

- Blake Thomas, Reel Neet Erosion Control will be sampling from IMP1 and IMP2 at the required frequency as described in the permit immediately.

- Review sampling results routinely and investigate the cause of elevated turbidity and/or total suspended solids above the background concentrations at instream monitoring point IMP1.
  - Blake Thomas, Reel Neet Erosion Control will be sampling from IMP1 and IMP2 at the required frequency as described in the permit. If there are elevated turbidity or suspended solids levels at IMP2, he will investigate the cause and take immediate steps to stop the release into the tributary.
- By November 30, 2016, submit copies of all twice-weekly inspection reports conducted September through November 2016 for the Collierville High School construction project.
  - By November 30, 2016, all twice-weekly reports will be properly signed and submitted.
- By November 30, 2016, submit a detailed written response and photo record to this office describing corrective actions taken and measures implemented to prevent the recurrence of these violations. Please include in the response why the SE sediment basin and associated temporary diversion ditch had not been installed though the entire drainage basin had been disturbed. Also, please explain why the required water depth gauges have not been installed in the NW and NE sediment basins.
  - The SE sediment basin and depth gauge has been installed. In addition, a diversion ditch has been dug to control water and direct it to the SE basin. The material excavated from this ditch has been placed between the ditch and the sediment silt fence along the top of the permanent ditch along the southern property line. All material from the ditch and the ditch itself has been stabilized with hydro-seed.
  - A rock check dam as well as angled silt fence have been installed just West of the diversion ditch to handle any waters that do not make it to the ditch.
  - The SE sediment basin had not been installed as shown on the permitted Erosion Control plans through the month of September for two reasons:
    1.) The area the SE basin was designed to collect storm water from had not been graded and the majority of the area remained undisturbed and drained to the north, allowing it to be captured in the NE basin.
    2.) The permanent diversion ditch along the southern property line had not been fully excavated and connected to the un-named tributary. Therefore, it captured and held all the on-site and off-site water which drained to it and allowed the contractor to treat it as a sediment basin. The volume of water stored in the ditch was calculated based on the linear feet of ditch holding water allowing Reel Neat Erosion Control to calculate the amount of chemical flocculent to add.
  - The southeast corner was out of compliance with the permit for a short transition between connecting the permanent drainage ditch along the southern property line with the un-named tributary and constructing the SE sediment basin, approximately two and one half weeks.

- Depth gauges were not installed in the NW and NE basins due to poor communication between the General contractor and the subcontractor over whose responsibility it was to place the depth gauges. However, Reel Neat Erosion Control communicated the limits of ponded water to the Renaissance Group who in turn, calculated the volume of stored water in the basin enabling Reel Neat Erosion Control to apply the correct amount of chemical flocculent to treat the basins.

Photo 1 Area adjacent to middle entrance from Sycamore Road. All rills have been graded and area stabilized with permanent sod.

Photo 2 Area adjacent to middle drive off Sycamore Road on the North side. Back slope stabilized with sod and hydroseed behind sod. Flow line is to grade and will receive 8 foot concrete swale.

Photo 3 Middle entrance off Shelby Drive. Grading complete and area stabilized with Flex-terra.

Photo 4 Middle entrance drive off Shelby Drive. Curb and gutter installed. Grading in front of the building is complete and stabilized with Flex-terra.

Photo 5 NW Basin with banks stabilized with Flex-terra.

Photo 6 Outfall SW1 at NW basin. Area is permanently stabilized, protected with silt fence, sod, and rip rap.

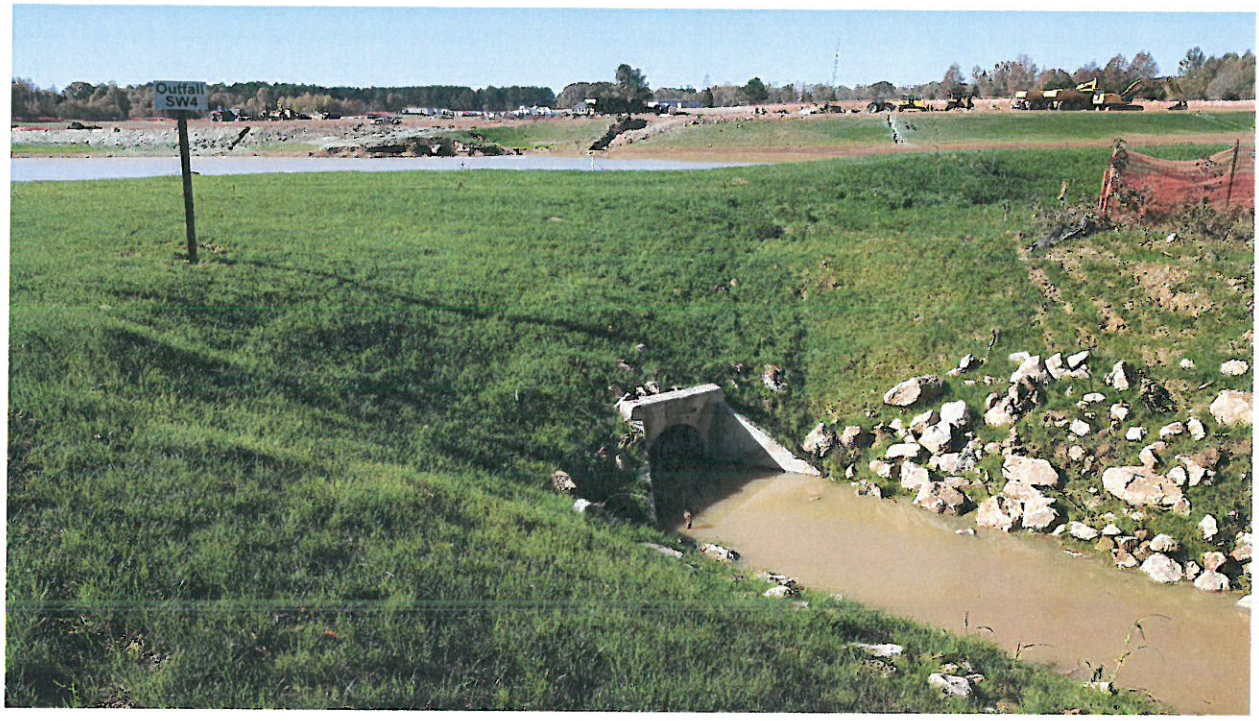

Photo 7 Outfall SW4 has been permanently stabilized. The waters shown here are back up from unnamed tributary of Nonconnah Creek. No discharge from NE basin.

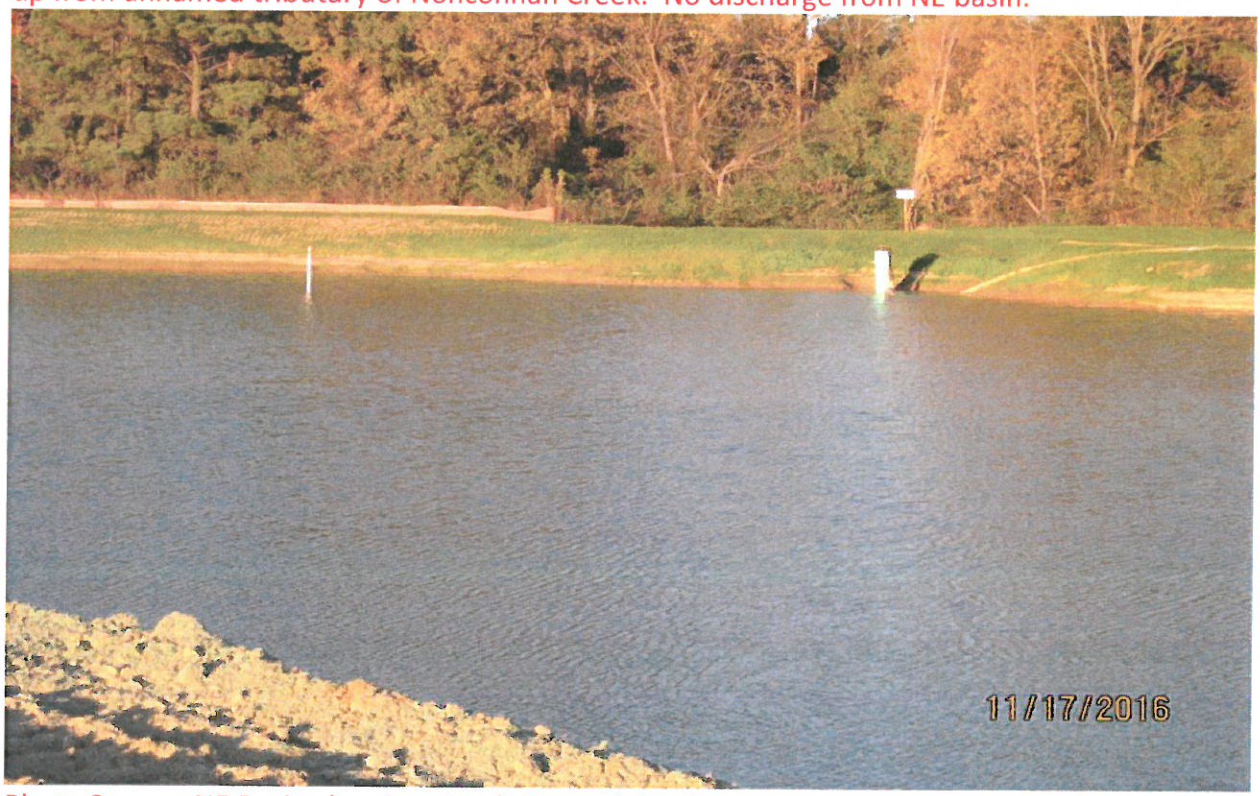

Photo 8 NE Basin showing stand pipe and depth gauge.

Photo 9 SE Sediment Basin with depth gauge and entrance of the diversion ditch. Side slopes have been hydroseeded.

Photo 10 Beginning of diversion ditch to the SE Sediment Basin. Stabilized stockpile in the background.

Photo 11 Area West of SE Basin. Silt fence and rock check dam are installed to control small area flow into main diversion ditch. Area stabilized with hydroseed.

Photo 12 View of Shelby Drive road improvements just North of our silt fence along our property line. Clearing along Shelby Drive has been done under the Shelby Drive TDEC permit and is not a part of the Collierville High School NPDES permit.

Photo 13 NPDES permit attached to construction sign at main entrance.

- Photo 14 One of three notices posted on our site. One is located on Shelby Drive even though Shelby Drive is closed for road improvements. Two notices are placed on each of the entrances off Sycamore Drive. The notice on the main entrance off Sycamore is attached to the fence near the entry road. This is the notice at the main entrance.